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9 Attorneys for Patrick McCaffrey, Sally
 10 McCaffrey, and the McCaffrey Family Trust.

11 UNITED STATES BANKRUPTCY COURT
 12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

13 In re

14 PG&E Corporation,
 15 and

16 PACIFIC GAS AND ELECTRIC
 17 COMPANY,

18 Debtors.

19 ☐ Affects PG&E Corporation
 20 ☐ Affects Pacific Gas and Electric Company
 21 ☒ Affects both Debtors

22 *All papers shall be filed in the Lead Case,
 23 No. 19-30088-DM,

Case No. 19-30088-DM

Chapter 11
 Lead Case, Jointly Administered

**DECLARATION OF RICHARD
 FRANKEL IN SUPPORT OF MOTION
 PURSUANT TO FED. R. BANKR. PROC.
 7015 AND 7017 FOR AN ORDER
 DEEMING PROPOSED AMENDED
 CLAIM TO RELATE BACK/OR
 PURSUANT TO FED. R. BANKR. P.
 9006(b)(1) TO ENLARGE THE TIME FOR
 PATRICK MCCAFFREY, SALLY
 MCCAFFREY, AND THE MCCAFFREY
 FAMILY TRUST TO FILE PROOF OF
 CLAIM**

Date: August 4, 2020
 Time: 10:00 a.m.
 Crtrm.: Courtroom 17
 450 Golden Gate Avenue
 San Francisco, CA 94102
 Judge: Hon. Dennis Montali

Objection deadline: July 28, 2020
 4:00 p.m. (Pacific Time)

24 I, Richard Frankel, hereby declare as follows:

25 1. I am an attorney at law duly licensed to practice before the courts of the State of
 26 Texas, and in numerous federal courts. I am a lawyer with Reiner, Slaughter & Frankel, LLP,
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1 based in Redding, California.

2 2. My law firm represents wildfire victims who sustained losses from the Camp Fire
3 in 2018. My firm has timely filed over 800 Proof of Claim forms with Prime Clerk for losses
4 clients have suffered as a result of these fires.

5 3. Patrick and Sally McCaffrey filed a proof of claim without counsel on August 27,
6 2019, well before the Bar Claim Deadline of December 31, 2019. At the time the McCaffreys did
7 not appreciate the difference between a trust beneficiary and a trustee of a trust, so they did not
8 identify the trust as a claimant.

9 4. In June 2020 the McCaffreys hired my firm to gather information and present their
10 claim; therein I discovered that the McCaffreys house belonged to their trust. Thus, part of my
11 clients' proof of claim also included damages which my clients' trust actually incurred (as owner
12 of record of the property damaged). The proof of claim does not identify the trust as a claimant or
13 in any capacity. The name of the trust is the McCaffrey Family Trust. Patrick and Sally
14 McCaffrey are trustees of the trust.

15 5. If this Court grants the relief requested in the Motion here, I am prepared to file an
16 amended proof of claim to reflect the trust as a proper claimant for certain real property damages.
17 The amended proof of claim would change neither the claimants' contact information nor the
18 nature and amount of damages they claim.

19 6. I am over eighteen years of age, of sound mind, and fully-competent to make this
20 declaration. All statements in this declaration are based on my own personal knowledge and
21 observation and from my review of the court and business records in this case, or upon
22 information and belief as indicated. If called to testify on this matter, I can and would competently
23 testify to the matters set forth in this Declaration.

24 I declare under penalty of perjury pursuant to the laws of the United States of America that
25 the foregoing is true and correct.

26 Executed this 14th day of July, 2020, in Houston, Texas.

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DOWNEY BRAND LLP

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By: 
RICHARD FRANKEL